

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	<b>:</b>	<b>CHAPTER 13</b>
<b>BRIAN KEITH LEWIS</b>	<b>:</b>	
<b>JULIE LYNN LEWIS</b>	<b>:</b>	<b>CASE NO. 1:17-bk-02713</b>
<b>fka Julie Lynn Huttemann</b>	<b>:</b>	
<b>Debtors</b>	<b>:</b>	
	<b>:</b>	
<b>FREEDOM MORTGAGE</b>	<b>:</b>	
<b>CORPORATION</b>	<b>:</b>	
<b>Movant</b>	<b>:</b>	
	<b>:</b>	
<b>v.</b>	<b>:</b>	
	<b>:</b>	
<b>BRIAN KEITH LEWIS</b>	<b>:</b>	
<b>JULIE LYNN LEWIS</b>	<b>:</b>	
<b>fka Julie Lynn Huttemann</b>	<b>:</b>	
<b>Respondents</b>	<b>:</b>	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Movant is protected by an equity cushion and Debtors believe that they are only due for this month (September 2022).
5. Denied. See response to paragraph 4.
6. Denied. See response to paragraph 4.
7. The Debtors lack knowledge or information sufficient to form a belief as to the truth of this averment, and therefore deny the same.
8. Denied. See response to paragraph 4.
9. Admitted.
10. Denied. See response to paragraph 4.
11. Denied. See response to paragraph 4.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

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